



KEN PAXTON
ATTORNEY GENERAL OF TEXAS

RAYMOND C. WINTER
Division Chief
Civil Medicaid Fraud Division

PHONE: (512) 936-1709
FAX: (512) 370-9477
EMAIL: Raymond.Winter@oag.texas.gov

January 13, 2022

Via ECF

Clerk of the United States District Court
Northern District of Texas
205 SE 5th Avenue, Room 133
Amarillo, Texas 79101

Re: *United States of America ex rel. Alex Doe, Relator, et al. v. Planned Parenthood Federation of America, Inc., et al.*; Civil Action No. 2:21-cv-00022-Z; United States District Court for the Northern District of Texas, Amarillo Division.

Dear District Clerk:

Please issue the attached six summonses to Defendants Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc., in the above-referenced federal False Claims Act and Texas Medicaid Fraud Prevention Act case.

When completed, please return the summonses to my email listed above at your earliest convenience. The summonses and the State of Texas's Complaint in Intervention will be served on Defendants in accordance with the Order of the Court.

Thank you.

Sincerely,

/s/ Raymond C. Winter
Chief, Civil Medicaid Fraud Division
Office of the Attorney General of Texas

Encls.



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205 SE 5th Avenue, Room 133
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When completed, please return the summonses to my email listed above at your earliest convenience. The summonses and the State of Texas's Complaint in Intervention will be served on Defendants in accordance with the Order of the Court.

Thank you.

Sincerely,

/s/ Raymond C. Winter
Chief, Civil Medicaid Fraud Division
Office of the Attorney General of Texas

Encls.

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

United States of America, ex rel. Doe, Relator, The
State of Texas, ex rel. Doe, Relator, et al.

Plaintiff

v.

Planned Parenthood Federation of America, Inc.,
Planned Parenthood Gulf Coast, Inc., et al.

Defendant

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) Civil Action No. 2:21-cv-00022-Z
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SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Planned Parenthood Cameron County, Inc.
Polin C. Barraza
2140 Babcock Road
San Antonio, Texas 78229

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Raymond C. Winter
Chief, Civil Medicaid Fraud Division
Office of the Attorney General of Texas
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 2:21-cv-00022-Z

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____ .

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____ , a person of suitable age and discretion who resides there,
 on *(date)* _____ , and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____ , who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____ ; or

☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*: _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

United States of America, ex rel. Doe, Relator, The
State of Texas, ex rel. Doe, Relator, et al.

Plaintiff

v.

Planned Parenthood Federation of America, Inc.,
Planned Parenthood Gulf Coast, Inc., et al.

Defendant

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) Civil Action No. 2:21-cv-00022-Z
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SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Planned Parenthood Federation of America
Office of the General Counsel
123 Williams Street
New York, New York 10038

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Raymond C. Winter
Chief, Civil Medicaid Fraud Division
Office of the Attorney General of Texas
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 2:21-cv-00022-Z

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

United States of America, ex rel. Doe, Relator, The
State of Texas, ex rel. Doe, Relator, et al.

Plaintiff

v.

Planned Parenthood Federation of America, Inc.,
Planned Parenthood Gulf Coast, Inc., et al.

Defendant

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) Civil Action No. 2:21-cv-00022-Z
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SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Planned Parenthood of Greater Texas, Inc.
Kenneth Lambrecht, Registered Agent
7424 Greenville Avenue, Suite 206
Dallas, Texas 75231

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Raymond C. Winter
Chief, Civil Medicaid Fraud Division
Office of the Attorney General of Texas
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 2:21-cv-00022-Z

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 was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

United States of America, ex rel. Doe, Relator, The
State of Texas, ex rel. Doe, Relator, et al.

Plaintiff

v.

Planned Parenthood Federation of America, Inc.,
Planned Parenthood Gulf Coast, Inc., et al.

Defendant

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) Civil Action No. 2:21-cv-00022-Z
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SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Planned Parenthood Gulf Coast, Inc.
Melaney Linton, Registered Agent
4600 Gulf Freeway
Houston, Texas 77023

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Raymond C. Winter
Chief, Civil Medicaid Fraud Division
Office of the Attorney General of Texas
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 2:21-cv-00022-Z

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☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____ , a person of suitable age and discretion who resides there,
 on *(date)* _____ , and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____ , who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____ ; or

☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*: _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

United States of America, ex rel. Doe, Relator, The
State of Texas, ex rel. Doe, Relator, et al.

Plaintiff

v.

Planned Parenthood Federation of America, Inc.,
Planned Parenthood Gulf Coast, Inc., et al.

Defendant

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) Civil Action No. 2:21-cv-00022-Z
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SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Planned Parenthood San Antonio, Inc.
Jeffrey Hons, Registered Agent
2140 Babcock Road
San Antonio, Texas 78229

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Raymond C. Winter
Chief, Civil Medicaid Fraud Division
Office of the Attorney General of Texas
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 2:21-cv-00022-Z

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 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

United States of America, ex rel. Doe, Relator, The
State of Texas, ex rel. Doe, Relator, et al.

Plaintiff

v.

Planned Parenthood Federation of America, Inc.,
Planned Parenthood Gulf Coast, Inc., et al.

Defendant

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) Civil Action No. 2:21-cv-00022-Z
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SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Planned Parenthood South Texas, Inc.
Jeffrey Hons, Registered Agent
2140 Babcock Road
San Antonio, Texas 78229

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

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Office of the Attorney General of Texas
P.O. Box 12548, Capitol Station
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If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

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Date: _____

Signature of Clerk or Deputy Clerk

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